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October 17, 1997

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VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

RECEIVED
OCT 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 94-102
Comments of
Matsushita Communication Industrial Corporation of America

Dear Mr. Caton:

Enclosed, on behalf of Matsushita Communication Industrial Corporation of America ("MCC"), are the original and five copies of MCC's Comments in CC Docket No. 94-102, in response to the *Public Notice* issued by the Commission on October 3, 1997, regarding extension of the compliance date of implementation of Enhanced 911 service over digital wireless services for TTY/TDD users.

If you have questions regarding this matter, please contact me.

Very truly yours,



Paul J. Feldman
Counsel for
Matsushita Communication Industrial
Corporation of America

PJF/jr
Enclosures

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ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of

Enhanced 911

Emergency Calling Systems

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CC Docket No. 94-102

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**COMMENTS OF
MATSUSHITA COMMUNICATION INDUSTRIAL
CORPORATION OF AMERICA**

Matsushita Communication Industrial Corporation of America ("MCC"), by its attorneys, hereby submits its Comments in response to the *Public Notice* issued by the Commission on October 3, 1997 in the above-referenced docket. In these Comments, MCC strongly supports an extension of the compliance date for implementation of Enhanced 911 ("E911") service over digital wireless services for TTY/TDD users, from November 30, 1997, to April 1, 1999. Such an extension, crafted in a recent public dialogue between the wireless telecommunications industry and major representatives of the TTY/TDD user and public safety communities, will best serve the public interest by providing the time necessary to refine and implement solutions to major technical issues that constitute a substantial barrier to the provision of wireless digital E911 service to TTY/TDD users.

Introduction

MCC is a U.S. subsidiary of Matsushita Electric Industrial Co., Ltd. ("MEI") of Japan. MEI has operations in 40 countries and employs over 265,000 employees

around the world. Along with its subsidiaries and affiliates, the Company manufactures and markets sophisticated electronics products under the Panasonic, Technics, and Quasar brand names. MCC employs some 12,000 Americans - 55 percent of them in manufacturing - in 26 states. In all of their enterprises, Matsushita companies continue to be inspired and led by the business philosophy of the company's founder, Konosuke Matsushita, that a company is indebted to society for its existence. That philosophy continues to be the foundation of MCC's policies. Based on that philosophy, Matsushita companies strive to contribute to society and improve the lives of people in the places where they conduct business.

One expression of that philosophy is that Matsushita companies have supported a variety of programs focused on assisting disabled persons overcome barriers to participation in the arts and cultural activities. For example: Panasonic was the first consumer electronics company to support and sponsor, through the WBGH Education Foundation, programming in Descriptive Video Service (DVS) and remains the largest corporate supporter of this program. DVS allows the 12 million blind and visually impaired Americans to "watch" television by listening to oral description of visual scenes, movements, settings, facial expressions, scenes changes, body language, etc., - during breaks in the regular dialogue or sound. All Panasonic stereo TVs and VCRs are equipped with a secondary audio program feature which allows them to receive DVS. Another is Panasonic's partnership with Very Special Arts (VSA). Through VSA, the company sponsors the Panasonic Young Soloist Award each year, which is presented to a physically-challenged young adult who sings or plays a musical

instrument. The award carries with it a \$10,000 scholarship for musical study. Through this program, Panasonic has found that there are indeed many talented young people whose disability does not slow them down at all.

Matsushita Electric Industrial Co., Ltd., of Japan is also focusing efforts on the development of easy-to-operate, user-friendly products for the home and for nursing homes and systems for the aging population of Japan. This includes user-friendly products designed to be used by the elderly and by persons with disabilities.

Matsushita Electric believes that appliances that are easy to operate by elderly and disabled persons are easy for everyone to use and it is increasingly developing general home appliances that feature user-friendly markings, operations, and functions.¹

MCC in North America produces and markets equipment which would come within the scope of this proceeding, including wireless telecommunications handsets. Therefore, MCC is vitally interested in the issues involved in the proceeding and offers the following Comments for the Commission's consideration.

Comments

MCC strongly supports ongoing efforts to make telecommunications facilities and

¹ The Matsushita Speech Technology Laboratory (STL), founded in 1981 in Santa Barbara, near the University of California campus, was established to be a world leader in speech processing research, and to develop natural easy-to-use speech interfaces for man-machine interaction in the future computer-oriented society. Automatic speech recognition represents STL's longest running work. STL's text-to-speech synthesis activities have concentrated on producing an efficient, software-only, PC-based English Synthesizer. Work on speech aids for persons with disabilities is divided between voice processing of esophageal speech and speech training for profoundly deaf children.

products accessible and useable by people with various disabilities, including the effort in this proceeding to make enhanced E911 services over digital wireless systems accessible for TTY/TDD users. However, MCC firmly believes that an extension of the compliance date for implementation of digital wireless E911 service for TTY/TDD users, from November 30, 1997, to April 1, 1999, is in the public interest.

MCC attended the September 17-19, 1997 Forum on Seeking Solutions to Wireless Digital TTY/TDD E911, sponsored by the Cellular Telephone Industry Association. MCC was greatly encouraged by the open dialogue and cooperation among representatives of wireless equipment manufacturers, wireless service providers, public safety agencies, and the hearing/speech disabled community and other users of TTY/TDD equipment. While the parties recognized that access to 911 through TTY/TDD equipment is currently available over analog equipment, it became very clear that substantial technical difficulties remain in making E911 available to TTY users over digital wireless systems. These technical difficulties are in two major areas, set forth below.

First, there is a need to enhance the acoustic coupling interface between TTY/TDD devices and mobile handsets. Most TTY/TDD devices were designed for the large handset on traditional stationary phones. Mobile handsets generally are smaller and shaped differently from the handsets of traditional stationary phones. While this interface issue applies to a certain extent to current analog wireless handsets, the problem is increased as newer digital handsets become smaller and smaller. While TTY/mobile handset adapter wires have been created to resolve this problem, these

adapters work with only a limited number of mobile handsets. There was productive discussion at the CTIA Forum regarding the creation of a standardized adapter, but no agreement has yet been reached by the equipment manufacturers on such a standardized adapter, and when such agreement is reached, it will still take many months to test and manufacture the adapter.

Second, even more critical to provision of digital wireless E911 services to TTY/TDD users is resolution of substantial vocorder/protocol problems in translating TTY messages into a digital format. These problems are aggravated by the use of different digital formats (TDMA, CDMA, GSM/PCS 1900) by different carriers. While presentations made at the CTIA Forum provided views of possible solutions, there was broad recognition that these presentations were based on initial tests under laboratory conditions, not "real world" conditions. Further testing is required, and when technological solutions are identified and standardized, it will take additional time to manufacture equipment and implement the solutions in networks across the country.

In sum, while progress was made at the CTIA Forum in identifying the technologies for providing digital wireless E911 to TTY/TDD users, it is clear that substantial work remains before such service can be made available at all, and certainly before such service can be consistently error-free, standardized, and ubiquitous.

At the recent CTIA Forum, there appeared to be broad acceptance by representatives of the TTY/TDD user community of the fact that it will take some additional time to resolve the technical issues described above. While MCC recognizes that some members of the TTY/TDD user community oppose an extension of the

compliance deadline based on assertions that work on technical problems should have been completed by now, MCC urges the Commission to recognize that such assertions do not change the present existence of technical barriers. The existing technical barriers cannot be "wished" away. Such barriers can only be eliminated by equipment manufacturers, carriers, TTY/TDD users, and public safety agencies working together to find effective and efficient solutions. MCC believes that the formation of the Working Groups at the CTIA Forum demonstrates the commitment of the effected parties to work together to find such solutions as quickly as possible. Accordingly, MCC urges the Commission to give the parties the time required to do the job correctly.

WHEREFORE, MCC requests that the Commission extend the compliance date for implementation of Enhanced 911 service over digital wireless services for TTY/TDD users, to April 1, 1999.

Respectfully submitted,

MATSUSHITA COMMUNICATION
INDUSTRIAL CORPORATION OF AMERICA

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